

EXHIBIT 4

Marie Jonas

From: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>
Sent: Wednesday, August 25, 2021 5:01 PM
To: Chantal Khalil; Jiyun Cameron Lee; Marie Jonas
Cc: Amanda Chan; Marie Appel x20020; Michael Ram x20021; Christina Romero; Keir Negron
Subject: RE: Lowell v. Lyft - Defendant's Deficient Discovery
Attachments: Depo Notice - Caleb Miller - Lowell v. Lyft.pdf; Depo Notice - Dongwon Lee- Lowell v. Lyft.pdf

Counsel,

Please provide your availability to confer about the issues set forth in the attached letter from August 18 and about Lyft's privilege log; we also want to confer about adding Joyce Chan as a custodian in light of the important documents in her possession (if these documents were produced as part of the ILRC production, we are open to withdrawing this request). Given that Lyft appears to have unilaterally withheld essential data that it had agreed to produce, we ask that you agree to extend the discovery deadline until three months after Lyft completes its production.

Attached please find notices for the depositions of Dongwon Lee & Caleb Miller – please suggest alternative dates if the noticed dates are problematic.

Finally, after attempting numerous times to download your [ILRC Document production](#), we have discovered numerous technical problems in the files. When we first downloaded the files when you sent us the link, not all of the required files were present but we were not aware that files were missing. Now that we are searching for the LyftSub bates stamped documents, we realize that the files are incomplete. In some attempts, the downloads crash. In other attempts, we receive an error message. In other attempts, the files have seemingly are successfully downloaded but upon closer inspection, there are missing files. After consulting with our IT Department on this matter, our IT Department has concluded that that are no restrictions on our side that would prevent us from being able to download the data. We have found this issue to be on the producing party's SharePoint site. Either we were not given the proper authority to download the files from the producing party's SharePoint site or when you uploaded these files onto their site, there was an error in the upload which is preventing access. Please transmit the files to us again in a different format.

Thanks,

Jeremiah

Jeremiah Frei-Pearson
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From: Chantal Khalil <ckhalil@fbfglaw.com>
Sent: Wednesday, August 18, 2021 9:59 PM
To: Jiyun Cameron Lee <jlee@folgerlevin.com>; Marie Jonas <mjonas@folgerlevin.com>
Cc: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>; Amanda Chan <AChan@FBFGLaw.com>; Marie Appel x20020

<MAppeI@forthepeople.com>; Michael Ram x20021 <MRam@forthepeople.com>; Christina Romero
<christinaromero@forthepeople.com>

Subject: Lowell v. Lyft - Defendant's Deficient Discovery

Counsel,

Please see the enclosed correspondence. As always, if you would like, we would be happy to confer at your convenience.

Best,
Chantal

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Thank you..